

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

UNITED STATES OF AMERICA	§	
	§	
V.	§	CRIMINAL NO. 3:24-CR-00049-S-9
	§	
AMIR MORTAZAVI (01), ARVIN	§	
ZEINALI (02), TRINITY CHAMPION	§	
HEALTH CARE PARTNERS, LLC (03),	§	
HEXAMED BUSINESS SOLUTIONS,	§	
LLC (04), ROBERT LEISTEN (05),	§	
AMY HAASE (06) A/K/A AMY HAASE	§	
KEARNE, ARNOLD FARBSTEN (07),	§	
BARRY WEINSTEIN (08),	§	
ERIC BERKMAN (09), JORGE CUZA	§	
(10), KATHREN MCCARTY (11),	§	
JAMES ELLIS (12), WALTER STRASH	§	
(13), DAVID WOLF (14)	§	

**DECLARATION OF INGER H. CHANDLER**  
**IN SUPPORT OF MOTION FOR LEAVE TO WITHDRAW AS COUNSEL**

I, Inger H. Chandler, declare as follows:

1. I am licensed to practice law in the State of Texas and make this declaration under penalty of perjury based on personal knowledge.
2. I am over the age of 18, of sound mind, and capable of making this declaration and the facts stated herein are true and correct to the best of my knowledge.
3. I was hired to serve as co-counsel for Defendant Eric Berkman (hereinafter “Defendant”) in this matter.
4. Defendant Berkman has more than adequate representation from his three counsels of record. Therefore, I am moving to withdraw as counsel for Defendant.
5. Notice has been provided of the filing of this Motion to Withdraw as Counsel to all counsel of record and there is no prejudice to any party involved in this matter.
6. This Motion to Withdraw as Counsel is UNOPPOSED.

I certify or declare under penalty of perjury, pursuant to the laws of the State of Texas, that the foregoing is true and correct.

EXECUTED this 29<sup>th</sup> day of January 2025.

/s/ Inger H. Chandler  
Inger H. Chandler

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 29<sup>th</sup> day of January 2025, I served a true and correct copy of the foregoing by delivering same to each of the following individuals by ECF electronic filing below, addressed as follows:

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